

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Global Force Entertainment, Inc. and Jeffrey)
Jarrett,)
Plaintiffs,)
v.) Case No. 3:18-cv-00749
Anthem Sports & Entertainment Corp., and)
Anthem Wrestling Exhibitions, LLC,)
Defendants.)

**DEFENDANTS ANTHEM SPORTS' MOTION TO DISMISS PLAINTIFFS' CLAIMS
FOR LACK OF PERSONAL MATTER JURISDICTION**

Defendant Anthem Sports & Entertainment Corp ("Anthem Sports")¹ moves to dismiss Plaintiffs' Complaint pursuant to Fed. R. Civ. P. 12(b)(2) because this Court lacks personal jurisdiction over it. As set forth in the Memorandum of Fact and Law filed contemporaneously with this Motion and in the Declaration of Ed Nordholm, Defendant Anthem Sports is a Canadian holding company that has no day to day operations other than the ownership of several subsidiaries that house the various Anthem brands. Its primary place of business is in Toronto, Canada. It does not do business in Tennessee, it is not qualified to do business in Tennessee, and it does not target Tennessee residents. It does not distribute content in Tennessee or elsewhere; all content distribution of the Anthem entities that are held by Anthem Sports is done through related companies or third party license agreements. As such, Plaintiffs cannot plausibly allege facts sufficient to establish that this Court can assert personal jurisdiction over Anthem Sports in a

¹ Anthem Sports again enters a special appearance in order to preserve its jurisdictional defense.

manner that is consistent with the Due Process Clause. Defendant Anthem Sports therefore requests that this Court dismiss Plaintiffs' claims against it on this basis.

A supporting Memorandum of Fact and Law is filed contemporaneously with this Motion, as is the Declaration of Ed Nordholm.

Respectfully submitted,

BASS, BERRY & SIMS PLC

By: /s/ Paige W. Mills

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2018, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

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